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United States Courts
Southern District of Texas
FILED

February 10, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

4:22-cr-81

CASE NO. _____

FILED UNDER SEAL

2. FRANKLIN LEE MORAN
AKA "FRANK"
AKA "FRANKIE"
3. ADOLFO HINOJOSA JR.
AKA "TETO"
AKA "UM6803"
4. ADAM ESPARZA
7. CALVIN PAUL BROUSSARD
AKA "PEE-WEE"
8. MARTIN DEJESUS LUEVANO
9. FIDENCIO RESENDEZ-REQUEJO
AKA "JUNIOR"
AKA "UM3389"
10. MARK ANTHONY VILLASANA
AKA "UM6995"
11. CHARLES EDWARD SMITH
AKA "CHARLIE"
AKA "UM7155"
12. THOMAS ALEXANDER PUCCIARELLO
AKA "TOMMY"

	AKA "UM0818"	§
		§
		§
		§
		§
		§
		§
		§
14.	CARLOS SALDANA	§
	AKA "UM9182"	§
		§
		§
		§
16.	JAVIER CHAVEZ-VALERIO	§
	AKA "JAVI"	§
	AKA "EL MICHOACANO"	§
17.	JUAN NAHUM GONZALES	§
	AKA "BIG JOHN"	§
	AKA "UM5232"	§
18.	TERRELL KINCHEN	§
	AKA "T-BO"	§
19.	SALVADOR MARROQUIN-HINOJOSA	§
20.	JORGE MARTINEZ-MONTALVO	§
	AKA "UM6371"	§
21.	GUADALUPE PADRON	§
	AKA "KARITA"	§
22.	JULIAN GONZALEZ-CHAVEZ	§
23.	FRANCISCO TORRES-GONZALEZ	§
		§
		§
		§
25.	VICTOR VILLARREAL-OCHOA	§
26.	ERIK ALAN RUIZ	§
	AKA "CAPI"	§
27.	JUVENAL TENTORY-HEREDIA	§
	AKA "JUVENAL TENTARY"	§
28.	JAIME AGUIRRE-CHAVEZ	§
	AKA "EL VIEJON"	§
29.	SAMMY SALDIVAR	§
	AKA "CHIEF"	§
		§
		§
31.	GERALD DEANDRE FORD	§

32.	RICARDO ENRIQUE REYNA	§
	AKA "RICKY"	§
	AKA "ALEXIS"	§
	AKA "UM7505"	§
33.	JORGE GONZALEZ-PEREZ	§
	AKA "UM5800"	§
34.	ALDO REYES-GARZA	§
	AKA "UM3835"	§
35.	PABLO ERNESTO SALDANA JR	§
	AKA "CARNAL"	§
	AKA "UM7778"	§
36.	JOSSYMAR ALFONSO MAR-ZUNIGA	§
	AKA "ALONSO"	§
	AKA "ALFONSO"	§
	AKA "UM6911"	§
37.	MARCO ANTONIO DAVILA-GOMEZ	§
	AKA "UM2368"	§
38.	DAVID RIVERA JR.	§
		§
		§
40.	BRIAN ROY ANDREWS	§
	AKA "UM9819"	§
41.	ALFREDO PAZ-PEDRAZA	§
	AKA "KILO"	§
	AKA "MIQUILO"	§
	AKA "MICKEY"	§
42.	DERICK LEMARK JACKSON	§
	AKA "D"	§
43.	ADALBERTO ELI CHAPA	§
	AKA "ELI"	§
44.	DIANA MORENO-GUILLEN	§
45.	CESAR MALDONADO-ALMAZAN	§
	AKA "MIGUEL MALDONADO-	§
	ALMAZAN	§
	AKA "JOSE ANTONIO QUIROZ"	§
	AKA "CASTOR"	§
	AKA "UM7054"	§
46.	ARMANDO FRAGOSO-GARCIA	§
47.	HEVERS FALCON	§
	AKA "UM2035"	§
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50. HUAN KONG NGUYEN	§
AKA "STEVEN NGUYEN"	§
AKA "JACKIE CHAN"	§
AKA "CHINO"	§
51. RAUL MANUEL DELACRUZ	§
AKA "JULIO MAURICIO MEDINA"	§
52. RAUL RUIZ-TREVINO	§
AKA "RAUL ACOSTA"	§
AKA "LA TUNA"	§
53. RAUL RUIZ III	§
54. SILVESTRE ALVAREZ JR.	§
55. EDGAR RANGEL	§
AKA "EDDIE"	§
AKA "EDGAR RANGEO"	§
56. MAURICIO SALAZAR-SALAZAR	§
AKA "UM1562"	§
57. GILBERTO GARCIA	§
58. BLANCA ESTHELA VILLARREAL	§
AKA "BLANQUITA"	§
59. SERGIO ARVIZU-AGUIRRE	§
	§
61. DAVID SOTO-OLIVEROS	§
62. RAUL TOVAR-LONGORIA	§
63. MARCO ANTONIO DAVILA JR	§
	§
	§

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

During the period between December 10, 2020, and December 15, 2021, persons identified as, but not limited to, the defendants named in this Indictment operated in and out of the Southern District of Texas to distribute cocaine, methamphetamine, heroin, fentanyl, and marijuana which

COUNT TWO

Possession with Intent to Distribute Fentanyl

On or about December 11, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(2) FRANKLIN LEE MORAN,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about December 13, 2020, and on or about December 16, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(3) ADOLFO HINOJOSA JR, and

(4) ADAM ESPARZA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT FOUR

Possession with Intent to Distribute Cocaine

On or about December 16, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (3) ADOLFO HINOJOSA JR, and
- (4) ADAM ESPARZA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about December 28, 2020, and on or about March 8, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (7) CALVIN PAUL BROUSSARD,
- (9) FIDENCIO RESENDEZ-REQUEJO,
- (11) CHARLES EDWARD SMITH,
- (12) THOMAS ALEXANDER PUCCIARELLO, and
- (20) JORGE MARTINEZ-MONTALVO,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This

violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SIX
Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about December 28, 2020, and on or about December 29, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(23) FRANCISCO TORRES-GONZALEZ,
did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SEVEN
Possession with Intent to Distribute Cocaine

On or about December 29, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(23) FRANCISCO TORRES-GONZALEZ,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHT

Conspiracy to Possess with Intent to Distribute Methamphetamine

Between on or about December 30, 2020, and on or about December 31, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(8) MARTIN DEJESUS LUEVANO,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT NINE

Possession with Intent to Distribute Methamphetamine

On or about December 31, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(8) MARTIN DEJESUS LUEVANO

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN
Conspiracy to Launder Monetary Instruments

Between on or about December 28, 2020, and or about January 11, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,
(9) FIDENCIO RESENDEZ-REQUEJO,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT ELEVEN
Laundering of Monetary Instruments

On or about January 10, 2021 through on or about January 11, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD, and
(9) FIDENCIO RESENDEZ-REQUEJO,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit,

possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT TWELVE

Conspiracy to Possess with Intent to Distribute Methamphetamine

Between on or about January 15, 2021, and on or about January 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(10) MARK ANTHONY VILLASANA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT THIRTEEN

Possession with Intent to Distribute Methamphetamine

On or about January 21, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(10) MARK ANTHONY VILLASANA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOURTEEN
Conspiracy to Possess with Intent to Distribute Heroin

Between on or about January 12, 2021, and on or about February 4, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(14) CARLOS SALDANA,
did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT FIFTEEN
Possession with Intent to Distribute Heroin

On or about February 4, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(14) CARLOS SALDANA,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTEEN
Conspiracy to Launder Monetary Instruments

Between on or about January 24, 2021, and or about February 6, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(11) CHARLES EDWARD SMITH, and

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT SEVENTEEN
Laundering of Monetary Instruments

On or about February 6, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(11) CHARLES EDWARD SMITH, and

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit,

possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT EIGHTEEN

Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about February 9, 2021, and on or about February 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(3) ADOLFO HINOJOSA JR,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT NINETEEN

Possession with Intent to Distribute Cocaine

On or about February 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(3) ADOLFO HINOJOSA JR,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY
Possession with Intent to Distribute Methamphetamine

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE
Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about February 8, 2021, and on or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(3) ADOLFO HINOJOSA JR,
(4) ADAM ESPARZA,
(16) JAVIER CHAVEZ-VALERIO, and
(17) JUAN NAHUM GONZALES,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT TWENTY-TWO
Possession with Intent to Distribute Cocaine

On or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (3) ADOLFO HINOJOSA JR,
- (4) ADAM ESPARZA,
- (16) JAVIER CHAVEZ-VALERIO, and
- (17) JUAN NAHUM GONZALES,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE
Conspiracy to Launder Monetary Instruments

Between on or about February 12, 2021, and or about February 23, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (7) CALVIN PAUL BROUSSARD,
- (11) CHARLES EDWARD SMITH,
- (18) TERRELL KINCHEN,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the

United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT TWENTY-FOUR
Laundering of Monetary Instruments

On or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(11) CHARLES EDWARD SMITH and
(18) TERRELL KINCHEN,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT TWENTY-FIVE
Laundering of Monetary Instruments

On or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the

United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT TWENTY-SIX
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT TWENTY-SEVEN
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT TWENTY-EIGHT
Conspiracy to Launder Monetary Instruments

On or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,
(9) FIDENCIO RESENDEZ-REQUEJO,
(12) THOMAS ALEXANDER PUCCIARELLO, and
(19) SALVADOR MARROQUIN-HINOJOSA,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT TWENTY-NINE
Laundering of Monetary Instruments

On or about February 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,
(9) FIDENCIO RESENDEZ-REQUEJO,
(12) THOMAS ALEXANDER PUCCIARELLO, and
(19) SALVADOR MARROQUIN-HINOJOSA,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY
Conspiracy to Launder Monetary Instruments

Between on or about February 23, 2021, and on or about February 25, 2021 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,
(11) CHARLES EDWARD SMITH, and

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT THIRTY-ONE
Laundering of Monetary Instruments

On or about February 23, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(11) CHARLES EDWARD SMITH,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-TWO
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-THREE
Laundering of Monetary Instruments

On or about February 24, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-FOUR
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-FIVE
Laundering of Monetary Instruments

On or about March 8, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(12) THOMAS ALEXANDER PUCCIARELLO,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-SIX
Conspiracy to Launder Monetary Instruments

Between on or about March 11, 2021, and or about March 26, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD, and
(21) GUADALUPE PADRON,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT THIRTY-SEVEN
Laundering of Monetary Instruments

On or about March 17, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-EIGHT
Laundering of Monetary Instruments

On or about March 26, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(21) GUADALUPE PADRON,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-NINE
Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about March 29, 2021, and on or about May 3, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT FORTY
Possession with Intent to Distribute Cocaine

On or about March 29, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(7) CALVIN PAUL BROUSSARD,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FORTY-ONE
Conspiracy to Possess with Intent to Distribute Methamphetamine

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT FORTY-TWO
Possession with Intent to Distribute Methamphetamine

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-THREE
Conspiracy to Possess with Intent to Distribute Fentanyl

Between on or about April 8, 2021, and on or about April 20, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(26) ERIK ALAN RUIZ

did knowingly and intentionally conspire and agree, with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT FORTY-FOUR
Possession with Intent to Distribute Fentanyl

On or about April 20, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(26) ERIK ALAN RUIZ,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-FIVE
Conspiracy to Possess with Intent to Distribute Methamphetamine

Between on or about March 30, 2021, and on or about April 14, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(27) JUVENAL TENTORY-HEREDIA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This

violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT FORTY-SIX
Possession with Intent to Distribute Methamphetamine

On or about April 14, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(27) JUVENAL TENTORY-HEREDIA,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-SEVEN
Possession of a Firearm by a Convicted Felon

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FORTY-EIGHT

Possession of a firearm by an illegal alien

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

COUNT FORTY-NINE

Possession of a Firearm by a Convicted Felon

On or about April 14, 2021, in the Houston Division of the Southern District of Texas,

(27) JUVENAL TENTORY-HEREDIA,

defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, that is, one (1) Springfield Armory XDS, 9-millimeter semi-automatic pistol, serial number S3998669 and one (1) Rossi 357 magnum revolver serial number GX839657, said firearms having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FIFTY

Conspiracy to Possess with Intent to Distribute Methamphetamine

Between on or about April 12, 2021, and on or about April 19, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(28) JAIME AGUIRRE-CHAVEZ,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT FIFTY-ONE

Possession with Intent to Distribute Methamphetamine

On or about April 19, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(28) JAIME AGUIRRE-CHAVEZ,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIFTY-TWO
Conspiracy to Launder Monetary Instruments

Between on or about April 23, 2021, and on or about May 4, 2021 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(11) CHARLES EDWARD SMITH,
(22) JULIAN GONZALEZ-CHAVEZ,
(29) SAMMY SALDIVAR,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT FIFTY-THREE
Laundering of Monetary Instruments

On or about May 4, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(11) CHARLES EDWARD SMITH,
(22) JULIAN GONZALEZ-CHAVEZ,
(29) SAMMY SALDIVAR,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT FIFTY-FOUR
Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about May 4, 2021, and on or about May 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (29) SAMMY SALDIVAR,
- (32) RICARDO ENRIQUE REYNA
- (33) JORGE GONZALEZ-PEREZ, and
- (34) ALDO REYES-GARZA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT FIFTY-FIVE
Possession with Intent to Distribute Cocaine

On or about May 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

- (29) SAMMY SALDIVAR,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIFTY-SIX
Conspiracy to Launder Monetary Instruments

Between on or about April 23, 2021, and or about May 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (11) CHARLES EDWARD SMITH,
- (31) GERALD DEANDRE FORD, and
- (36) JOSSYMAR ALFONSO MAR-ZUNIGA,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT FIFTY-SEVEN
Laundering of Monetary Instruments

On or about May 11, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (11) CHARLES EDWARD SMITH and
- (31) GERALD DEANDRE FORD,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit,

possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT FIFTY-EIGHT
Laundering of Monetary Instruments

On or about May 12, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA,
did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT FIFTY-NINE
Conspiracy to Possess with Intent to Distribute Methamphetamine

Between on or about May 11, 2021, and on or about May 19, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(38) DAVID RIVERA JR and
did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SIXTY

Possession with Intent to Distribute Methamphetamine

On or about May 19, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(38) DAVID RIVERA JR and

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTY-ONE

Laundering of Monetary Instruments

On or about May 27, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(12) THOMAS ALEXANDER PUCCIARELLO

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SIXTY-TWO
Laundering of Monetary Instruments

On or about June 1, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(40) BRIAN ROY ANDREWS

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SIXTY-THREE
Conspiracy to Launder Monetary Instruments

Between on or about June 28, 2021, and or about June 29, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(33) JORGE GONZALEZ-PEREZ and
(43) ADALBERTO ELI CHAPA,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT SIXTY-FOUR
Laundering of Monetary Instruments

On or about June 29, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(33) JORGE GONZALEZ-PEREZ and
(43) ADALBERTO ELI CHAPA,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SIXTY-FIVE
Conspiracy to Launder Monetary Instruments

Between on or about June 29, 2021, and on or about June 30, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(16) JAVIER CHAVEZ-VALERIO and
(44) DIANA MORENO-GUILLEN,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT SIXTY-SIX
Laundering of Monetary Instruments

On or about June 30, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(16) JAVIER CHAVEZ-VALERIO and
(44) DIANA MORENO-GUILLEN,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SIXTY-SEVEN
Conspiracy to Possess with Intent to Distribute Fentanyl

Between on or about June 28, 2021, and on or about July 3, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(22) JULIAN GONZALEZ-CHAVEZ and
(46) ARMANDO FRAGOSO-GARCIA,

did knowingly and intentionally conspire and agree, with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SIXTY-EIGHT
Possession with Intent to Distribute Fentanyl

On or about July 3, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(22) JULIAN GONZALEZ-CHAVEZ and
(46) ARMANDO FRAGOSO-GARCIA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTY-NINE
Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about June 22, 2021, and on or about July 18, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(41) ALFREDO PAZ-PEDRAZA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SEVENTY

Possession with Intent to Distribute Cocaine

On or about July 16, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(41) ALFREDO PAZ-PEDRAZA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVENTY-ONE

Conspiracy to Launder Monetary Instruments

Between on or about June 23, 2021, and or about July 16, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(33) JORGE GONZALEZ-PEREZ,
(42) DERICK LEMARK JACKSON,
(52) RAUL RUIZ-TREVINO,
(53) RAUL RUIZ III, and
(54) SILVESTRE ALVAREZ JR,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT SEVENTY-TWO
Laundering of Monetary Instruments

On or about July 16, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(33) JORGE GONZALEZ-PEREZ,
(42) DERICK LEMARK JACKSON,
(52) RAUL RUIZ-TREVINO,
(53) RAUL RUIZ III, and
(54) SILVESTRE ALVAREZ JR,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SEVENTY-THREE
Conspiracy to Possess with Intent to Distribute Marijuana

Between on or about July 2, 2021, and on or about July 6, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(37) MARCO ANTONIO DAVILA-GOMEZ,
(45) CESAR MALDONADO-ALMAZAN, and
(47) HEVERS FALCON

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(D).

COUNT SEVENTY-FOUR

Conspiracy to Possess with Intent to Distribute Cocaine

On or about July 15, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA,

(51) RAUL MANUEL DELACRUZ

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT SEVENTY-FIVE

Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about July 13, 2021 and on or about July 18, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA,

(50) HUAN KONG NGUYEN,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT SEVENTY-SIX
Possession with Intent to Distribute Cocaine

On or about July 18, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA,

(50) HUAN KONG NGUYEN,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVENTY-SEVEN
Conspiracy to Possess with Intent to Distribute Cocaine

On or about July 16, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and

(55) EDGAR RANGEL,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT SEVENTY-EIGHT

Conspiracy to Possess with Intent to Distribute Cocaine

On or about July 22, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(35) PABLO ERNESTO SALDANA JR.
(56) MAURICIO SALAZAR-SALAZAR,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT SEVENTY-NINE

Possession with Intent to Distribute Cocaine

On or about July 22, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(35) PABLO ERNESTO SALDANA JR.
(56) MAURICIO SALAZAR-SALAZAR,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHTY

Conspiracy to Possess with Intent to Distribute Cocaine

On or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(57) GILBERTO GARCIA,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT EIGHTY-ONE

Possession with Intent to Distribute Cocaine

On or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(57) GILBERTO GARCIA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHTY-TWO

Conspiracy to Possess with Intent to Distribute Marijuana

Between on or about July 18, 2021, and on or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(58) BLANCA ESTHELA VILLARREAL,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT EIGHTY-THREE

Possession with Intent to Distribute Marijuana

On or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(32) RICARDO ENRIQUE REYNA and
(58) BLANCA ESTHELA VILLARREAL,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT EIGHTY-FOUR
Possession of a Firearm by a Convicted Felon

On or about July 28, 2021, in the Houston Division of the Southern District of Texas,

(25) VICTOR VILLARREAL-OCHOA,

defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, that is,

one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386306495,

one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386284243, and

one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386180226,

said firearms having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHTY-FIVE
Possession with Intent to Distribute Marijuana

On or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(32) RICARDO ENRIQUE REYNA,

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHTY-SIX
Possession with Intent to Distribute Cocaine

On or about July 28, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(32) RICARDO ENRIQUE REYNA,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHTY-SEVEN
Possession of a Firearm by a Convicted Felon

On or about July 28, 2021, in the Houston Division of the Southern District of Texas,

(32) RICARDO ENRIQUE REYNA,
defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, that is,

one (1) FN Five-sevenN, 5.7 millimeter pistol, serial number 386193154 and

one (1) Glock pistol, serial number RWL031,

said firearms having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHTY-EIGHT

Conspiracy to Possess with Intent to Distribute Cocaine

Between on or about July 15, 2021 and on or about August 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA and

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT EIGHTY-NINE

Possession with Intent to Distribute Cocaine

On or about August 10, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA and

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETY
Laundering of Monetary Instruments

On or about August 11, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT NINETY-ONE
Possession of a firearm by an illegal alien

On or about August 11, 2021, in the Houston Division of the Southern District of Texas,

(36) JOSSYMAR ALFONSO MAR-ZUNIGA

defendant herein, knowing that he was an alien that is illegally and unlawfully in the United States, did knowingly possess firearms, namely,

one (1) Springfield Armory V10, pistol, .45 caliber, serial number N350284 and

one (1) Diamondback DB15, 5.56 millimeter rifle, serial number 1726165,

said firearms having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

COUNT NINETY-TWO
Possession with Intent to Distribute Cocaine

Between on or about August 12, 2021 and on or about August 13, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

(59) SERGIO ARVIZU-AGUIRRE

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETY-THREE
Conspiracy to Launder Monetary Instruments

Between on or about August 12, 2021, and on or about August 14, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(59) SERGIO ARVIZU-AGUIRRE and

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT NINETY-FOUR
Laundering of Monetary Instruments

On or about August 14, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(59) SERGIO ARVIZU-AGUIRRE and

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT NINETY-FIVE
Conspiracy to Possess with Intent to Distribute Cocaine

On or about October 5, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(22) JULIAN GONZALEZ-CHAVEZ and
(61) DAVID SOTO-OLIVEROS

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT NINETY-SIX
Possession with Intent to Distribute Cocaine

On or about October 5, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(22) JULIAN GONZALEZ-CHAVEZ and
(61) DAVID SOTO-OLIVEROS

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETY-SEVEN
Conspiracy to Launder Monetary Instruments

Between on or about October 5, 2021, and or about October 26, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(22) JULIAN GONZALEZ-CHAVEZ and
(62) RAUL TOVAR-LONGORIA,

did knowingly conspire with each other and others known and unknown to the Grand Jury, to knowingly transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

COUNT NINETY-EIGHT
Laundering of Monetary Instruments

On or about October 26, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(22) JULIAN GONZALEZ-CHAVEZ and
(62) RAUL TOVAR-LONGORIA,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from places in the United States to places outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, possession and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT NINETY-NINE
Conspiracy to Possess with Intent to Distribute Cocaine

On or about November 8, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(37) MARCO ANTONIO DAVILA-GOMEZ,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown, to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT ONE HUNDRED
Possession with Intent to Distribute Cocaine

On or about November 8, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(37) MARCO ANTONIO DAVILA-GOMEZ,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED-ONE
Possession with Intent to Distribute Cocaine

On or about December 7, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

(37) MARCO ANTONIO DAVILA-GOMEZ and
(63) MARCO ANTONIO DAVILA JR,
aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully, and intentionally attempt to possess with intent to distribute controlled substances. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED-TWO
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT ONE HUNDRED-THREE
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT ONE HUNDRED-FOUR
Possession with Intent to Distribute Cocaine

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED-FIVE
Laundering of Monetary Instruments

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

NOTICE OF CRIMINAL FORFEITURE
(21 U.S.C. § 853(a))

Pursuant to Title 21, United States Code, Section 853(a), the United States of America
gives notice to the defendants,

- (2) FRANKLIN LEE MORAN
- (3) ADOLFO HINOJOSA JR
- (4) ADAM ESPARZA

- (7) CALVIN PAUL BROUSSARD
- (8) MARTIN DEJESUS LUEVANO
- (10) MARK ANTHONY VILLASANA
- (11) CHARLES EDWARD SMITH
- (12) THOMAS ALEXANDER PUCCIARELLO

- (14) CARLOS SALDANA
- (16) JAVIER CHAVEZ-VALERIO
- (17) JUAN NAHUM GONZALES
- (20) JORGE MARTINEZ-MONTALVO
- (22) JULIAN GONZALEZ-CHAVEZ
- (23) FRANCISCO TORRES-GONZALEZ

- (26) ERIK ALAN RUIZ
- (27) JUVENAL TENTORY-HEREDIA
- (28) JAIME AGUIRRE-CHAVEZ
- (29) SAMMY SALDIVAR

- (31) GERALD DEANDRE FORD
- (32) RICARDO ENRIQUE REYNA
- (33) JORGE GONZALEZ-PEREZ
- (34) ALDO REYES-GARZA
- (35) PABLO ERNESTO SALDANA JR.
- (36) JOSSYMAR ALFONSO MAR-ZUNIGA
- (37) MARCO ANTONIO DAVILA-GOMEZ
- (38) DAVID RIVERA JR.

- (41) ALFREDO PAZ-PEDRAZA
- (42) DERICK LEMARK JACKSON

(45) CESAR MALDONADO-ALMAZAN
(46) ARMANDO FRAGOSO-GARCIA
(47) HEVERS FALCON

(50) HUAN KONG NGUYEN
(51) RAUL MANUEL DELACRUZ
(55) EDGAR RANGEL
(56) MAURICIO SALAZAR-SALAZAR
(57) GILBERTO GARCIA
(58) BLANCA ESTHELA VILLARREAL
(59) SERGIO ARVIZU-AGUIRRE
(61) DAVID SOTO-OLIVEROS
(63) MARCO ANTONIO DAVILA JR

that upon conviction of Conspiracy to Possess with Intent to Distribute a Controlled Substance,
the following property, whether real or personal, is subject to forfeiture:

- 1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such conspiracy; and
- 2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such conspiracy.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 924(d)(1))

Pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, the United States hereby gives notice to defendants,

(27) JUVENAL TENTORY-HEREDIA,
(25) VICTOR VILLARREAL-OCHOA,
(32) RICARDO ENRIQUE REYNA, and
(36) JOSSYMAR ALFONSO MAR-ZUNIGA,

that all firearms and ammunition involved in or used in the commission of the offense in violation of Title 18, United States Code, Sections 922(g) and 924(a)(2), are subject to forfeiture, including but not limited to, the following:

1. one (1) Springfield Armory XDS, 9-millimeter semi-automatic pistol, serial number S3998669;
2. one (1) Rossi 357 magnum revolver serial number GX839657;
3. one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386306495;
4. one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386284243;
5. one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386180226;
6. one (1) FN Five-seveN, 5.7 millimeter pistol, serial number 386193154;
7. one (1) Glock pistol, serial number RWL031;
8. one (1) Springfield Armory V10, pistol, .45 caliber, serial number N350284; and
9. one (1) Diamondback DB15, 5.56 millimeter rifle, serial number 1726165.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notices to the defendants,

- (7) CALVIN PAUL BROUSSARD
- (9) FIDENCIO RESENDEZ-REQUEJO
- (11) CHARLES EDWARD SMITH
- (12) THOMAS ALEXANDER PUCCIARELLO

- (16) JAVIER CHAVEZ-VALERIO
- (18) TERRELL KINCHEN
- (19) SALVADOR MARROQUIN-HINOJOSA
- (21) GUADALUPE PADRON
- (22) JULIAN GONZALEZ-CHAVEZ
- (29) SAMMY SALDIVAR

- (31) GERALD DEANDRE FORD
- (33) JORGE GONZALEZ-PEREZ
- (36) JOSSYMAR ALFONSO MAR-ZUNIGA
- (37) MARCO ANTONIO DAVILA-GOMEZ
- (40) BRIAN ROY ANDREWS
- (42) DERICK LEMARK JACKSON
- (43) ADALBERTO ELI CHAPA
- (44) DIANA MORENO-GUILLEN
- (45) CESAR MALDONADO-ALMAZAN
- (52) RAUL RUIZ-TREVINO
- (53) RAUL RUIZ III
- (54) SILVESTRE ALVAREZ JR
- (59) SERGIO ARVIZU-AGUIRRE

- (62) RAUL TOVAR-LONGORIA

that, upon conviction of a conspiracy in violation of Title 18, United States Code, Section 1956(h), a violation of Title 18, United States Code, Section 1956(a)(2)(A), all property, real or personal, involved in such money laundering offenses or traceable to such property, is subject to forfeiture to the United States.

PROPERTY SUBJECT TO FORFEITURE

The property to be forfeiture, includes, but is not limited to, approximately \$10,000,000 in United States currency.

MONEY JUDGEMENT

Defendants are notified that upon conviction, a money judgement may be imposed equal to the value of the property subject to the forfeiture, for which the defendants may be jointly and severally liable.

SUBSTITUTE ASSETS

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendants,

- 1) cannot be located upon the exercise of due diligence;
- 2) has been transferred or sold to, or deposited with, a third party;
- 3) has been placed beyond the jurisdiction of the court;
- 4) has been substantially diminished in value; or
- 5) has been commingled with other property which cannot be divided without difficulty,

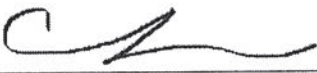
the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture, pursuant to Title 21, United States Code, Section 853(p), and Title 18, United States Code, Section 982(b).

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY
UNITED STATES ATTORNEY

By:



Christine J. Lu
Sherin S. Daniel
Leo J. Leo
Assistant United States Attorneys